

Opposition Deadline: September 27, 2016

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*Attorneys for Defendants Access Industries,
Inc., Access Industries Holdings LLC, Nell
Limited, AI International S.à.r.l., Len Blavatnik,
Lincoln Benet, and Philip Kassin*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: LYONDELL CHEMICAL	:	Case No. 09-10023 (CGM)
COMPANY, <i>et al.</i> ,	:	Chapter 11
Debtors.	:	
-----X	:	(Jointly Administered)
EDWARD S. WEISFELNER, AS LITIGATION	:	
TRUSTEE OF THE LB LITIGATION TRUST,	:	
Plaintiff,	:	
v.	:	Adv. Pro. No. 09-1375 (MG)
LEONARD BLAVATNIK, <i>et al.</i> ,	:	
Defendants.	:	
-----X	:	

**NOTICE OF ACCESS DEFENDANTS' MOTION *IN LIMINE* TO PRECLUDE
CERTAIN TESTIMONY OF RALPH TULIANO, DAVID WITTE, AND H.G. NEBEKER**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Declaration of Richard I Werder, Jr., both dated September 20, 2016, the undersigned attorneys for Defendants Access Industries, Inc., Access Industries Holdings LLC, AI International S.à.r.l, Nell Limited, Len Blavatnik, Lincoln Benet, and Philip Kassin (collectively, the "Access

Defendants”), will move before the Honorable Martin Glenn, United States Bankruptcy Judge, of the United States Bankruptcy Court, Southern District of New York, Manhattan Division, One Bowling Green, New York, New York, at a date and time to be determined by the Court, for an order pursuant to Federal Rule of Evidence 702, made applicable to these proceedings by Rule 9017 of the Federal Rules of Bankruptcy Procedure, to preclude Plaintiff Edward S. Weisfelner, as Litigation Trustee of the LB Litigation Trust, from proffering certain testimony of his designated experts Ralph Tuliano, David Witte, and H.G. Nebeker.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court’s order at the September, 12, 2006 hearing, Plaintiff’s opposition shall be due on or before September 27, 2016.

Dated: New York, New York
September 20, 2016

QUINN EMANUEL URQUHART
& SULLIVAN, LLP

By: /s/ Richard I. Werder, Jr.

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